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**UNITED STATES DISTRICT COURT**

## DISTRICT OF OREGON

## **PORLAND DIVISION**

IN RE NIKE, INC. SECURITIES LITIGATION ) Case No. 3:24-cv-00974-AN  
 )  
 ) **STIPULATION AND [PROPOSED]**  
 ) **ORDER REGARDING SECOND**  
 ) **AMENDED CONSOLIDATED CLASS**  
 ) **ACTION ALLEGATION**  
 ) **COMPLAINT**  
 )  
 )  
 ) Judge: Hon. Adrienne Nelson  
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**WHEREAS**, on February 10, 2025, Court-appointed Lead Plaintiffs Caisse de dépôt et placement du Québec and Deka Investment GmbH (collectively, “Lead Plaintiffs”) filed the First Amended Consolidated Class Action Allegation Complaint for Violations of the Federal Securities Laws in the above captioned action, ECF No. 53 (the “First Amended Complaint”).

**WHEREAS**, after that filing, Lead Plaintiffs claim to have identified certain errors in the First Amended Complaint and, on February 28, 2025, sent counsel for Defendants Nike, Inc. (“NIKE”), John J. Donahoe II, Matthew Friend, Heidi L. O’Neill, Andrew Campion, and Mark G. Parker (collectively “Defendants”) a redline comparison showing proposed changes to the First Amended Complaint.

**WHEREAS**, Lead Plaintiffs assert that the purpose of the proposed amendments is not to supplement the substance of the allegations in the First Amended Complaint, but to correct various scrivener’s errors, enhance consistency throughout the First Amended Complaint, and clarify ambiguities, including, for example, instances where a confidential witness’s identifying number was inadvertently omitted or mislabeled, where an internal citation or cross-reference required correction, and where an alleged misstatement was inadvertently duplicated or misdescribed. A redline showing Lead Plaintiffs’ changes is attached as Exhibit A.

**WHEREAS**, Defendants disagree with Lead Plaintiffs’ characterization of the proposed changes to the First Amended Complaint as not substantive and as “scrivener’s errors,” but also do not oppose the filing of an amended complaint.

**WHEREAS**, Defendants agree that their undersigned counsel are authorized to accept, and hereby do accept, service of the summons and complaint in this matter on behalf of Defendants O’Neill, Campion and Parker, without prejudice and without waiver of any of Defendants’ defenses, objections, or arguments, except as to sufficiency of service of process.

**WHEREAS**, per the Stipulation and Order Setting Deadline to File the Amended Complaint and Motion to Dismiss Briefing Schedule that was entered by the Court on November 12, 2024, ECF No. 50 (the “November 12, 2024 Stipulation”), Defendants are scheduled to answer, move against, or otherwise respond to the First Amended Complaint by May 12, 2025; Lead Plaintiffs are scheduled to oppose any motion(s) Defendants may file by August 11, 2025; and Defendants are scheduled to file any replies by September 25, 2025.

**IT IS THEREFORE STIPULATED AND AGREED**, by and among the undersigned counsel of record for the parties indicated below, the following:

1. Lead Plaintiffs may file an amended complaint reflecting only the changes included in Exhibit A, which will be titled the “Second Amended Consolidated Class Action Allegation Complaint for Violations of the Federal Securities Laws,” and which will serve as the currently operative Complaint in this action.
2. Lead Plaintiffs shall file the Second Amended Consolidated Class Action Allegation Complaint for Violations of the Federal Securities Laws within two days of when the Court enters this Order.
3. Undersigned counsel for Defendants are authorized to accept, and hereby do accept, service of the summons and complaint in this matter on behalf of Defendants O’Neill, Campion and Parker, without prejudice and without waiver of any of Defendants’ defenses, objections, or arguments, except as to sufficiency of service of process.
4. The briefing schedule set forth in the November 12, 2024 Stipulation will remain unchanged, meaning that Defendants shall answer, move against, or otherwise respond to the Second Amended Consolidated Class Action Allegation Complaint for Violations of the Federal Securities Laws by May 12, 2025; Lead Plaintiffs shall have until August 11, 2025 to oppose any

motion(s) to dismiss that Defendants may to file; and Defendants shall have until September 25, 2025 to file any replies to Lead Plaintiffs' opposition papers.

DATED: March 20, 2025

Respectfully submitted,

/s/ Irina Vasilchenko  
Irina Vasilchenko

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DATED: March 20, 2025

Respectfully submitted,

/s/ B. John Casey

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*Attorneys for Defendants Nike, Inc., John J. Donahoe II, Matthew Friend, Heidi L. O'Neill, Andrew Campion, and Mark G. Parker*

PURSUANT TO STIPULATION, IT IS ORDERED.

DATED:

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Hon. Adrienne Nelson

**SIGNATURE ATTESTATION**

I am the ECF User whose identification and password are being used to file the foregoing Stipulation and [Proposed] Order Regarding Second Amended Consolidated Class Action Allegation Complaint. Pursuant to L.R.11-1(b)(2) regarding signatures, I, Irina Vasilchenko, attest that concurrence in the filing of this document has been obtained.

DATED: March 20, 2025

/s/ Irina Vasilchenko

Irina Vasilchenko